

**UNITED STATES BANKRUPTCY
COURT
DISTRICT OF NEW JERSEY**

Cohen, Placitella & Roth, P.C.
Christopher M. Placitella
Dennis M. Geier
cplacitella@cprlaw.com
dgeier@cprlaw.com
127 Maple Avenue
Red Bank, NJ 07701
Telephone: (732) 747-9003
Facsimile: (732) 747-9004

Attorneys for Movants Kimberly Naranjo

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11
Case No. 21-30589 (MBK)

Hearing Date: July 6, 2022

**KIMBERLY NARANJO'S JOINDER TO THE OBJECTIONS TO
THE CONTINUATION OF THE INJUNCTION AS TO JOHNSON &
JOHNSON FILED ON BEHALF OF THE TALC CLAIMANT'S
COMMITTEE AND OTHERS**

Creditor, Kimberly Naranjo, hereby joins and adopts the submissions of numerous creditors in objecting to the continuation of the injunction as to non-debtor, Johnson & Johnson. (See Docket No. 2558, 2564, 2566, 2568). While

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933

Kimberly Naranjo adopts these briefs in their entirety, Kimberly Naranjo submits this joinder to emphasize the inequity to victims, like her, of the continued injunction as to Johnson & Johnson.

Ms. Naranjo was diagnosed with mesothelioma about one month before LTL Management existed, and approximately one month and two days before it filed for bankruptcy. As such, she submits the following:

1. Johnson & Johnson sold and/or marketed asbestos containing Baby Powder for more than a hundred years.
2. Kimberly Naranjo used asbestos containing Johnson's Baby Powder during every decade of her life.
3. Johnson & Johnson marketed Baby Powder as a product that women should use on their children as part of being a good mother.
4. Kimberly Naranjo used Johnson's Baby Powder because she wanted to be a good mother.
5. Within the last twelve months, Johnson & Johnson was told it has a AAA credit rating, higher than the U.S. government.²

² <https://seekingalpha.com/article/4501005-johnson-and-johnson-this-low-risk-high-growth-and-highly-credible-stock-is-a-strong-buy>

6. Within the last twelve months, Kimberly Naranjo was told she has mesothelioma, a terminal form of cancer.
7. Since LTL Management filed for bankruptcy, Johnson & Johnson continues to generate billions of dollars in income.³
8. Since LTL Management filed for bankruptcy, Kimberly Naranjo's income is \$0.
9. Since LTL Management filed for bankruptcy, Johnson & Johnson hired a new CEO, Joaquin Duato, and pays him approximately \$13,000,000 per year.
10. Since her diagnosis, Kimberly Naranjo had to resign from her dream job as an addiction counselor at the Sherriff's Office due to her advanced mesothelioma.
11. When requested to testify before Congress regarding asbestos in its talcum powder, Johnson & Johnson refused to appear.⁴

³ Johnson & Johnson Form 10-K, filed February 17, 2022, and Form 10-Q, filed April 29, 2022.

⁴ <https://www.cnbc.com/2019/12/09/jj-ceo-spurns-us-congressional-hearing-on-carcinogens-in-talc-products.html>

12. When invited to testify before Congress regarding LTL Management's bankruptcy, Kimberly Naranjo appeared and answered all questions posed.⁵
13. Johnson & Johnson's real estate holdings are currently worth nearly \$19 billion dollars.⁶
14. Kimberly Naranjo, a single mother, owns no real estate since she was forced to sell her home and move in with her mother.
15. Johnson & Johnson continues to conduct business as usual.
16. Kimberly Naranjo's latest business dealings include the purchase of her final resting place before entering hospice care.
17. Johnson & Johnson is expected to exist in perpetuity.
18. Kimberly Naranjo is not expected to survive to the end of this year.
19. As a parent company, Johnson and Johnson continues to support its subsidiaries.
20. As a single parent to two minor children, one with special needs, Ms. Naranjo is being cared for by her children as she enters the end stage of her life.

⁵ <https://www.judiciary.senate.gov/imo/media/doc/Naranjo%20Testimony.pdf>

⁶ <https://www.investor.jnj.com/annual-meeting-materials/2021-annual-report> at 55.

21. Johnson & Johnson continues to pay out dividends to its stockholders.
22. Kimberly Naranjo's children will be orphans and destitute without the kindness of extended family.
23. In the last four months, Johnson & Johnson has paid one of its law firms, Jones Day, more than \$7 million. See Docket No. 2604.
24. Johnson & Johnson has not offered a penny to Kimberly Naranjo or her children.
25. Johnson & Johnson seeks to avoid responsibility to Kimberly Naranjo by utilizing its newly formed shell company's bankruptcy filing to shield itself from the harm it caused.
26. Kimberly Naranjo seeks the return of her Constitutional right to a trial by jury as guaranteed by the 7th Amendment.

Kimberly Naranjo is the embodiment of the Third Circuit's explicit recognition:

The clear damage to the plaintiffs is the hardship of being forced to wait for an indefinite and, if recent experience is any guide, a lengthy time before their causes are heard. Moreover, we cannot ignore the fact that *plaintiffs and crucial witnesses are dying, often from the very diseases that have led to these actions.*

Gold v. Johns-Manville Sales Corp., 723 F.2d 1068, 1076 (3d Cir. 1983) (emphasis added).

WHEREFORE, Ms. Naranjo requests that the Court a **DENY** any further extension of the preliminary injunction barring prosecution of claims against non-debtor Johnson & Johnson as to Ms. Naranjo and others.

COHEN, PLACITELLA & ROTH PC

/S/ Christopher M. Placitella
Christopher M. Placitella (ID 27781981)
Dennis M. Geier (ID 035272006)
(732) 747-9003
cplacitella@cprlaw.com
dgeier@cprlaw.com

Dated: July 5, 2022